



March 5, 2013

Marlene H. Dortch
445 12th Street, S.W.
Room TW-A325
Washington, D.C. 20554

Re: *Vonage's Petition for Limited Waiver*, CC Docket No. 99-200, GN Docket No. 13-5

Dear Ms. Dortch:

On March 1, 2013, Graham McGonigal, Kurt Rogers, Brendan Kasper, Ed Mulligan, Mike Doherty, and Craig Lennon, all of Vonage, and Kristine Devine and the undersigned, of Wiltshire & Grannis LLP, spoke by phone with Michael Steffen, Wireline Advisor to Chairman Genachowski, Julie Veach, Chief of the Wireline Competition Bureau, and Lisa Gelb, Bill Dever, and Travis Litman of the Wireline Competition Bureau, to discuss Vonage's above-captioned request for direct access to numbering resources. I also spoke separately with Mr. Steffen.

During those phone calls, Vonage reiterated the importance of direct access to numbers, and urged the Commission to move forward with Vonage's requested waiver. Vonage explained that the Commission should grant the waiver in a manner that will foster the success of efforts to establish IP interconnection arrangements that allow the provision of higher quality and less costly service. Vonage further explained that any waiver should provide sufficient scope and certainty that other providers will have incentives to negotiate agreements to interconnect and exchange traffic with Vonage on an IP basis. Vonage described the volume and distribution of numbers it receives from its numbering partners, and explained how both the volume of traffic exchanged with a particular provider and geographic scope impact the incentive of that provider to enter into an agreement to exchange traffic on an IP basis.

If you have questions or require any additional information, please do not hesitate to contact me at (202) 730-1346.

Sincerely,

A handwritten signature in black ink, appearing to read 'BDS' followed by a stylized flourish.

Brita D. Strandberg
Counsel to Vonage Holdings Corp.

cc: Bill Dever
Lisa Gelb
Travis Litman
Michael Steffen
Julie Veach